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12 UNITED STATES BANKRUPTCY COURT  
13 NORTHERN DISTRICT OF CALIFORNIA – DIVISION 1

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15 In Re: Case No.: 11-13214-AJ  
16 DEAN GREGORY ASIMOS, Chapter 7  
17 Debtor. DEBTOR'S MOTION TO VOID LIEN  
18 IMPAIRING EXEMPTION PURSUANT TO  
19 11 U.S.C. §522(f)  
20  
21 Judge: Hon. Judge Jaroslovsky

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23 To the United States Bankruptcy Court, the Honorable Judge Jaroslovsky, the  
24 United States Trustee, the Chapter 7 Trustee, Jason Everett Thompson, Wired Real  
25 Estate Group, Inc., C. Todd Norris, OCWEN Loan Servicing, Vincent P. O'Leary, all  
26 creditors, and all other parties in interest:

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28 Debtor hereby moves this court for an Order voiding the lien of Jason Everett  
Thompson, an individual, and Wired Real Estate Group, Inc., a California corporation  
(hereinafter collectively “Lienholders”) on the grounds it impairs an exemption to which the  
debtor is entitled.

29 At the commencement of the case, debtor Dean Gregory Asimos (hereinafter “Debtor”)  
30 owned the real property commonly known as 1040 East MacArthur Street, Sonoma, California

1 95476 (hereinafter "Property") and more fully described in **Exhibit A** attached to the  
2 Declaration of Dean Gregory Asimos filed concurrently herewith.

3 Lienholders have a judgment lien in the principal amount of \$450,038.00 which was  
4 perfected by the recordation of a judgment lien in the County of Sonoma, State of California  
5 where the Property is located. Said recordation was filed on October 28, 2013, as document  
6 number 2013105086 (hereinafter "Lien").

7 The property had a fair market value of \$607,600.00 as of the commencement of the  
8 instant action.

9 The Debtor claimed an exemption in the amount of \$100.00 in the Property under  
10 California Code of Civil Procedure §703.140(b)(5).

11 The Property was subject at the commencement of the case to liens senior to the Lien as  
12 follows:

a. OCWEN Loan Servicing:	\$764,872.80
b. Vincent P. O'Leary:	<u>\$125,000.00</u>
	\$889,872.80
c. Lienholders:	\$450,038.00

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18 11 U.S.C. §522(f) provides that the debtor may void a lien which impairs an exemption  
19 to which he is otherwise entitled. The Lien impairs the allowed exemption of \$100.00 which  
20 exceeds the value of the Property.

21 **WHEREFORE**, the Debtor prays for an Order that the court determine that the Lien of  
22 Jason Everett Thompson and Wired Real Estate Group, Inc. impairs an exemption to which the  
23 Debtor is entitled and that the Lien be declared to be null and void as to the Property.

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25 **SAGARIA LAW, P.C.**

26 Dated: January 20, 2014

27 By: /s/ Joe Angelo, Esq.  
Joe Angelo, Esq.  
28 Attorney for Debtor